

Appl. No. 09/521,235  
Office Action mailed April 8, 2005  
Response transmitted June 7, 2005

Attorney Docket No. 10022/112

### REMARKS

1. Claims 1-24 are pending in the application. No amendments are currently presented, but a listing of the claims is provided for the convenience of the Examiner. The Examiner is thanked for withdrawing previous rejections under 35 U.S.C. §§ 101 and 103(a). The present office action rejects Claims 1-24 under 35 U.S.C. § 102(e) as anticipated by U.S. Pat. No. 6,324,541 to Paris de l'Etraz et al. ("de l'Etraz").

2. As stated above, Claims 1-24 are rejected as anticipated by de l'Etraz. The invention recited in Claim 1 is for a method of developing a dossier. The method recites steps of receiving into a computer a name of a client and presenting a list consisting of industries associated with the client. Once the user enters the name of a client, a list of industries consisting only of those industries associated with the client is presented to the user. The user is then allowed to select an industry from the list, and the computer searches for information relating to the client and the selected industry. The last step of the method of Claim 1 is to prepare a dossier utilizing the information found during the searching. Applicants submit that the steps of Claim 1 are not taught or suggested in de l'Etraz, as discussed in the following separate headings.

Claim 1, the step of "presenting on a computer-user interface a list consisting of industries associated with the client"

The second step of Claim 1 is "presenting on a computer-user interface a list consisting of industries associated with the client." This is not a list of random industries, or a list of all industries, but rather a list of industries associated specifically with the client whose name was received in the previous step. As described in the specification, these industries are already associated with the client and stored in the information repositories. See specification, p. 36, lines 6-9, stating that "a list of industries associated with the client(s) is presented to the user in operation 1804." The rejection cites de l'Etraz as anticipating this step in passages at col. 3, lines 41-63 and col. 5, lines 43-60.

The first passage from de l'Etraz concerns a user's sphere of influence, and the passage specifically mentions relational patterns between the user and entities (through

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the persons associated with those entities) in public or private databases or both. The passage discusses providing a contact pathway, receiving an organization or person's name input, searching for associations between the user and the organization and/or person, displaying a contact pathway. The first passage also mentions finding and displaying an optimal path based on the degree of familiarity each person has (e.g., friends, golfing buddies, casual acquaintances, etc.) with the next person along the contact pathway.

The second passage from de l'Etraz, col. 5, lines 43-60, discusses a stand-alone application program that allows a user to enter and store private contact information, and a data-mining tool that allows the user to intelligently establish his or her contacts and display, via a graphical user interface, the optimal relationship path to reach other desired contacts. This allows the user to learn the full sphere of their influence.

Applicants submit that these passages do not teach or suggest the recited limitation, the rejection stating only that de l'Etraz teaches that the computer interface presents a graphical representation of the relational patterns between the user and the entities, "through the persons associated with those entities." Office Action, p. 3, lines 4-7. Applicants submit that these passages do not teach or suggest presenting a list of "industries" associated with the client, because they do not refer to industries. At least this step of Claim 1 is not taught or suggested in the references.

Claim 1, the step of "allowing selection of an industry from the list of industries"

The rejection cites col. 15, lines 24-52, from de l'Etraz for this limitation, the rejection stating that the contact intelligence data mining (CIDM) tool may accept input to populate a private database from commercially available contact manager software applications, and provide a GUI push button or radio button in each of the above named contact manager software applications. Office Action, p. 3, lines 8-12. Applicants interpret the passage as teaching that a user inputs private contact information, such as information about a person, e.g., the person's organization, department, role or position, nationality, address, telephone numbers, etc. In an alternative embodiment, the CIDM may accept contact data from each user in a batch format, by using applications such

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as Microsoft Outlook, Lotus Organizer, and the like from other commercially available contact manager software applications. de l'Etraz, col. 15, lines 28-48.

Even taking these characterizations at face value, the rejection does not state, and de l'Etraz does not teach, that a list of industries is present or is presented, or that the user is allowed to select an industry from the list of industries. Not even a single industry is taught or suggested in de l'Etraz. Accordingly, Applicants submit de l'Etraz does not teach or suggest this limitation of Claim 1.

Claim 1, the step of "searching in a plurality of computer-readable knowledge repositories for information related to the client and the selected industry"

The rejection states that this limitation is found in de l'Etraz in two passages at col. 3, lines 47-55 and col. 15, lines 53-64, the rejection stating that these passages teach searching the databases for associations between the user and the organization and/or person. Office Action, p. 3, lines 13-16. Even taking this assertion at face value, the rejection does not assert that de l'Etraz teaches searching the repositories for information related to the client and the selected industry. In addition, the passages cited discuss receiving names of persons and organizations, and searching for matches between the names entered and the contact database.

de l'Etraz does not teach, and the Office Action does not assert that he teaches, searching for information related to the client and the selected industry. As noted above, de l'Etraz does not teach recording data concerning an industry in the database. de l'Etraz therefore does not teach searching among the data for an industry, because he does not teach that such data is recorded. This claim limitation is not taught or suggested in de l'Etraz.

Claim 1, the step of "preparing a dossier utilizing the information found during the search"

A dossier is defined in the present application as a collection of information about people, documents, and past projects pertaining to information that has been requested. Specification, p. 11, lines 1-3. The rejection cites de l'Etraz, Fig. 19 and col. 22, lines 44-55, as teaching the step of preparing a dossier, the rejection stating that de

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l'Etraz teaches that there are two subfolders available to the user for browsing. Office Action, p. 3, lines 17-19. The rejection does not assert, and de l'Etraz does not teach, the limitation of "preparing a dossier utilizing the information found during the search." de l'Etraz teaches that there are two subfolders available for browsing, as shown in Fig. 19, one for people and one for organizations. de l'Etraz does not teach preparation of a dossier, but rather two subfolders that hold all information gathered during creation of the database. Even if the two subfolders are considered to be a "dossier," the subfolders are not prepared using the method recited in Claim 1.

Accordingly, de l'Etraz does not teach the step of preparing a dossier utilizing information found during the search as claimed in Claim 1.

At least steps (b), (c), (d), and (e) of Claim 1 are not taught or suggested in de l'Etraz, and they are certainly not anticipated by disclosures in de l'Etraz. Accordingly, Applicants respectfully request the Examiner to withdraw the rejection of Claim 1.

Claims 2-6 depend from Claim 1 and are allowable for at least that reason. Claims 7 and 13 recite limitations similar to those of Claim 1, but directed to a computer program embodied on a computer-readable medium for developing a dossier, or for a computer system and logic that performs the steps of the method of Claim 1. Accordingly, Claims 7 and 14 and dependent Claims 8-12 and 14-18 are also allowable.

#### Claims 2, 8, and 14

Claims 2, 8 and 14 recite a limitation concerning presenting an alternate list of industries not associated with the client. The rejection states that de l'Etraz teaches this step at col. 17, lines 13-21, which states, according to the Office Action, that a database system and services have traditionally deleted and removed a person's name from their database as these persons become disassociated with a company board. Office Action, p. 3, last two lines, to p. 4, line 2.

This passage in de l'Etraz does not teach or suggest a search, nor is there a teaching or suggestion of presenting an alternate list of industries not associated with the client. The rejection itself concerns only persons and companies, not an industry or a list of industries. Moreover, de l'Etraz only teaches that individuals can be identified as having

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been formerly affiliated with a company, but not teach presenting a list of only contacts with only the former affiliations. Accordingly, de l'Etraz does not teach or suggest this step of the method of Claim 2, or the code segment of claim 8, or the logic of Claim 14. The Examiner is respectfully requested to withdraw the rejection of Claims 2, 8, and 14.

#### Claims 3, 9, and 15

Claims 3, 9 and 15 recite further limitations concerning displaying topics associated with the client and allowing selection of at least one of the topics for insertion of information relating to the selected at least one of the topics in the dossier. The rejection cites de l'Etraz, Fig. 25B and passages at col. 18 and col. 20 as teaching these limitations. Fig. 25B and the passages, according to the rejection, teach a contact pathway which may be displayed as a node diagram, in which the nodes denote organizations and the links denote people. Office Action, p. 4, lines 3-10. This passage teaches the contacts between people and organizations, but does not teach or suggest displaying topics associated with a client.

One definition of a "topic" is "the subject of a discourse or of a section of a discourse." Merriam-Webster's Collegiate Dictionary, 10th ed. at 1244. In the present application, documents or discussion items may be marked by the authors as pertaining to a specified topic. Specification, p. 24, lines 18-20. In this context, topic is distinguished from persons or people, documents, projects, or clients. See Specification, p. 24, lines 6-28. See also Figs. 10-11, listing 17 topics, or subjects, associated with a person. If the search were performed for a client, the computer interface would display a list of topics associated with the client. de l'Etraz does not teach such a listing, but rather shows links in a node diagram between organizations and people, as shown in de l'Etraz Figs. 25A and 25B, and in the two passages cited.

Accordingly, de l'Etraz does not teach or suggest displaying "topics" associated with a client, and therefore does not teach or suggest the limitations of Claims 3, 9 and 15.

#### Claims 4, 10, and 16

Claims 4, 10 and 16 recite limitations wherein the dossier is arranged according to people, documents, and projects. As explained in the specification, persons may include

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employees. Specification, p. 24, lines 11-12. The claimed dossier is intended to amass information concerning the person, topic, client, documents, etc. de l'Etraz, on the other hand, has no interest in anything except contacts between persons and other organizations. Therefore, de l'Etraz simply teaches the lists of organizations and persons, which are most likely employees, as seen in the portions of de l'Etraz cited for this rejection, Figs. 4-24 and col. 20, lines 47-52.

de l'Etraz does not teach a dossier, and does not teach that the contents of a dossier are arranged according to people, documents, and projects, because de l'Etraz teaches only people, contacts, and organizations or companies, and not documents or projects. Therefore, de l'Etraz does not teach the limitations of Claims 4, 10 and 16.

Claims 5, 11, and 17

Claims 5, 11 and 17 recite limitations for the dossier in which a people section is arranged according to the number of documents and projects an individual has produced related to the client or the industry. The rejection cites de l'Etraz, col. 23, lines 40-48 and lines 50-56, as teaching these limitations. Office Action, p. 4, lines 15-18. The cited passages concern listings of persons or organizations, and state that there may be listings of persons or organizations, and that the listings may be searched. There is no teaching or suggestion of documents produced by the persons or of projects related to the persons or the organizations. Accordingly, de l'Etraz does not teach that the contents of a dossier are arranged according to the number of documents and projects an individual has produced. Therefore, de l'Etraz does not teach the limitations of Claims 5, 11, and 17.

Claims 6, 12, and 18

Claims 6, 12 and 18 recite limitations for the dossier in which documents are arranged chronologically. The rejection cites Fig. 19 of de l'Etraz, with no further explanation. Office Action, p. 4, lines 19-21. Fig. 19 displays what appears to be a listing of countries and persons within a country. The countries are arranged alphabetically, as are the persons with the displayed country. In the specification concerning Fig. 19, de l'Etraz states that the "Known By" folder may contain information on which fellow employees may have access to an individual, and that the "Contact Pathway" folder may contain information on people and organizations to which the fellow employee has direct

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access. de l'Etraz, col. 22, lines 44-55. However, there is no mention of documents and no teaching or suggestion of a chronological order.

Accordingly, de l'Etraz does not teach or suggest the limitations of Claims 6, 12 and 18. The Examiner is respectfully requested to withdraw rejections of Claims 6, 12, and 18.

#### Claim 19

Claim 19 recites the method of Claim 3, further comprising searching for information related to the at least one of the selected topics, and then displaying that information. The rejection cites de l'Etraz, col. 9, lines 51-55, as teaching browsing and establishing contacts of one's contacts and then displaying the optimal relationship path to reach other desired contacts. Office Action, p. 5, lines 18-22.

As discussed above for Claim 3, the present application distinguishes "topics" from "people" or "persons." While de l'Etraz teaches contacts between organizations and persons, he does not teach searching for information by topic, and does not teach displaying information by topic. Accordingly, de l'Etraz does not teach the limitations of Claim 19, which is therefore not anticipated by de l'Etraz. The Examiner is respectfully requested to withdraw the rejection of Claim 19.

#### Claims 21 and 23

Claims 21 and 23 recite respectively the method of Claim 1 and Claim 2, in which the list of industries associated with the client is presented in response to receiving the name of the client. The rejection cites de l'Etraz, col. 23, lines 40-48, as teaching this limitation. Office Action, p. 6, lines 5-7 and 12-14. The cited passage teaches that if one searches for persons named "Mack," a list is produced of persons whose name is Mack or whose name begins with Mack. A user may then click on any of the names produced, and company for whom the person works will be displayed, along with their position.

This passage teaches that a person's organization and position are presented when the user clicks on the person's name. This passage does not teach or suggest a list of industries or that the list of industries is presented in response to receiving the name of a client. Accordingly, de l'Etraz does not teach or suggest the limitations of Claims 21 and 23, and the Examiner is respectfully requested to withdraw rejections of Claims 21 and 23.

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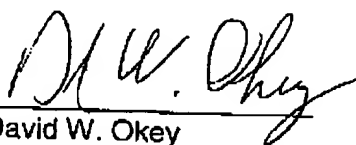
Claims 22 and 24

Claims 22 and 24 recite respectively the methods of Claim 21 and Claim 23, in which the association of one or more industries with the name of the client is stored. The rejection cites de l'Etraz, Fig. 3 and col. 14, lines 26-42, as teaching this limitation. Office Action, p. 6, lines 8-14. Figs. 3A and 3B (there is no Fig. 3) and the passage concern the relationship between an organization and a person. Figs. 3A and 3B list some of the detailed information de l'Etraz collects about the organization and the person, such as information about the organization (accountability information, ownership, key contacts), and personal information about the person (name, birthday, age).

The figures and the passages do not list any industry and do not teach associating an industry with the name of a client, nor do they teach storing the association. Accordingly, de l'Etraz does not teach or suggest these limitations of Claims 22 and 24. The Examiner is respectfully requested to withdraw the rejections of Claims 22 and 24.

3. Applicants have shown that the reference does not anticipate or make obvious the claims of the present application because the reference does not teach or suggest all the limitations of the claims. Applicants respectfully request the Examiner to withdraw the rejections and to grant allowance of this application.

Respectfully submitted,



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